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Transmittal Number: 25026509
Date Processed: 06/07/2022

Notice of Service of Process

Primary Contact: Walgreens Distribution
Corporation Service Company- Wilmington, DELAWARE
251 Little Falls Dr
Wilmington, DE 19808-1674

Entity: Walgreen Co.
Entity ID Number 0501431

Entity Served: Walgreen Co.

Title of Action: Michael Corin vs. Walgreen Co.

Matter Name/ID: Michael Corin vs. Walgreen Co. (12403884)

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Davidson County Circuit Court, TN

Case/Reference No: 22C1057

Jurisdiction Served: Tennessee

Date Served on CSC: 06/06/2022

Answer or Appearance Due: 30 Days

Originally Served On: CSC

How Served: Certified Mail

Sender Information: Morgan & Morgan - Nashville, PLLC
615-514-4199

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To avoid potential delay, please do not send your response to CSC

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CIRCUIT COURT SUMMONS

NASHVILLE, TENNESSEE

Service ID 297669

STATE OF TENNESSEE
DAVIDSON COUNTY
20TH JUDICIAL DISTRICT

MICHAEL CORIN

VS.

WALGREEN CO.
RA THE PRENTICE-HALL CORP SERV CO
2908 POSTON AVENUE
NASHVILLE, TN 37203

Plaintiff

Defendant

CIVIL ACTION
DOCKET NO. 22C1057
Method of Service:
Certified Mail

To the above named Defendant:

You are summoned to appear and defend a civil action filed against you in the Circuit Court, 1 Public Square, Room 302, P.O. Box 196303, Nashville, TN 37219-6303, and your defense must be made within thirty (30) days from the date this Summons is served upon you. You are further directed to file your defense with the Clerk of the Court and send a copy to the Plaintiff's attorney at the address listed below.

In case of your failure to defend this action by the above date, judgment by default will be rendered against you for the relief demanded in the Complaint.

ISSUED: 05/31/2022

RICHARD R. ROOKERCircuit Court Clerk
Davidson County, Tennessee

By:



Deputy Clerk

ADDRESS OF PLAINTIFF'S ATTORNEY OR PLAINTIFF:

JAMES THOMAS SULLIVAN
810 BROADWAY
STE 105
NASHVILLE, TN 37203

NOTICE TO THE DEFENDANT:

Tennessee law provides a Ten Thousand and 00/100 Dollars (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

I, Richard R. Rooker, Clerk of the Circuit Court in the State and County aforesaid, do hereby certify this to be a true and correct copy of the original summons issued in this case.



RICHARD R. ROOKER, CLERK

By: 

D.C.



To request an ADA accommodation, please contact Dart Gore at (615) 880-3309

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MICHAEL CORIN

vs.

WALGREEN CO.
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2908 POSTON AVENUE
NASHVILLE, TN 37203

Plaintiff

Defendant

CIVIL ACTION
DOCKET NO. 22C1057
Method of Service:
Certified Mail

I hereby certify and return, that on the _____ day of _____, 20____, I sent, postage prepaid by registered return receipt mail or certified return receipt mail, a certified copy of the Summons and a copy of the Complaint/Petition in Docket No. 22C1057 to the Defendant, WALGREEN CO. On the _____ day of _____, 20____, I received the return receipt for said registered or certified mail, which had been signed by _____ on the _____ day of _____, 20____. Said return receipt is filed with the original Summons Return and both documents are being sent herewith to the Circuit Court Clerk for filing.

SWORN TO AND SUBSCRIBED BEFORE ME, ON THIS
PERSON

____ DAY OF _____, 20____.

PLAINTIFF, PLAINTIFF'S ATTORNEY or OTHER

AUTHORIZED BY STATUTE TO SERVE PROCESS

____ NOTARY PUBLIC or ____ DEPUTY CLERK
MY COMMISSION EXPIRES: _____

To request an ADA accommodation, please contact Dart Gore at (615) 880-3309

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE
AT NASHVILLE

MICHAEL CORIN,)
)
 PLAINTIFF,) DOCKET NO:
) JURY DEMANDED
 v.)
 WALGREEN CO.)
)
 DEFENDANT.)

COMPLAINT FOR DAMAGES

Comes now the Plaintiff, Michael Corin, (hereinafter referred to as "Plaintiff") for his cause of action against Defendant, Walgreen Co. (hereinafter referred to as "Defendant") located at 700 N Jackson Street, Tennessee 37388 (hereinafter "subject premises") and would respectfully show unto this Honorable Court as follows:

PARTIES, JURISDICTION and VENUE

1. The Plaintiff is a citizen and resident of Springhill, Tennessee.
2. Upon information and belief, Defendant is a foreign corporation, with a principal office at 200 Wilmot Road, Deerfield, Illinois 60015. Defendant may be served through its registered agent The Prentice-Hall Corporation Service Company 2908 Poston Avenue, Nashville, Tennessee 37203.
3. The incident from which these injuries to the Plaintiff arise occurred in Coffee County, Tennessee.
4. Venue is proper in Davidson County, Tennessee, pursuant to T.C.A. § 20-4-101 *et seq.* as Defendant is a foreign corporation with its registered agent located in Davidson County.

5. On or about July 2, 2021, the Plaintiff was a guest/customer upon the subject premises owned by Defendant.
6. The Plaintiff fell due to a dangerous condition, causing him to sustain serious injuries.
7. The Plaintiff's fall was proximately caused by the negligence of the Defendant and/or its agents who maintained the subject premises in a dangerous condition, and failed to take appropriate safety precautions, thereby causing serious hazards to the Plaintiff and other guests.
8. The Plaintiff's fall was proximately caused by the negligence of the Defendant and/or its agents in failing to maintain the area in question and to discover the dangerous condition.
9. The Defendant knew or should have known of the dangerous condition in existence upon the subject premises at the time of the incident.
10. The Defendant was negligent in failing to warn the Plaintiff of the hazard that existed on the subject premises.
11. The Defendant was negligent of the common law in maintaining an unsafe condition herein referred to, which negligence ultimately caused Plaintiff's injuries and damages.
12. Through the above-listed acts and omissions, Defendant failed to use the ordinary care that ordinarily careful business owners and/or persons would use to avoid injury to others under the same or similar circumstances.
13. During all relevant times herein, all acts of Defendant's officers, agents, employees, and/or servants are imputed to Defendant via the doctrine of *respondeat superior*.

14. As a direct and proximate result of the negligence of Defendant, and its officers, agents, employees, and/or servants, the Plaintiff suffered serious, disabling, painful and permanent bodily injuries, causing the Plaintiff to become liable for medical and other expenses and to suffer an impairment to his body.
15. As a direct and proximate result of the negligence of Defendant and its employees, the Plaintiff alleges that he is entitled to damages, including but not limited to the following specific items of damages:
 - a. Physical pain, both past and future;
 - b. Emotional suffering and grief, both past and future;
 - c. Health care expenses; both past and future;
 - d. Loss of enjoyment of life;
 - e. Costs of this cause; and
 - f. All other general damages and other relief allowed under the laws of the state of Tennessee to which he is entitled.

WHEREFORE, PLAINTIFF PRAYS:

1. For a judgment against Defendant, holding it liable for compensatory damages in an amount to be determined by the jury in this cause sufficient to adequately compensate the Plaintiff for her injuries and losses, but not to exceed \$250,000.00.
2. For cost of this matter to be taxed to the Defendant.
3. That service of process issue and be served upon Defendant requiring Defendant to appear and answer within the time required by law.
4. For a jury trial to try this matter.
5. For such other, further and general relief to which Plaintiff is entitled under the law.

Respectfully submitted,

/s/ James T. Sullivan

James T. Sullivan, BPR#036332
Morgan & Morgan - Nashville, PLLC
810 Broadway, Suite 105
Nashville, Tennessee 37203
jtsullivan@forthepeople.com
615-514-4199

